

ATTACHMENT E

Public Comments Received On The Riley Ridge Final EIS.

1-1

OREGON-CALIFORNIA TRAILS ASSOCIATION

January 5, 1984 401-1-1400000

MS. JAS-2 401-03

Mr. Russell T. Lorraine
Butte Resources
Box 1229
Cheyenne, WY 82001

Dear Mr. Lorraine:

I was most pleased to receive the Final EIS on Allay Ridge, and to see NEPA featured so prominently in it. I am a little upset at the delete for the negative error on Page 3-6 in the EIS but I accept it.

What NEPA cannot accept is the segment route as depicted on your Map 3-1 to the Final EIS, and the route of the oil/gas pipeline as depicted on your Map.

Your planners are ignoring two important variants of the trail. One is long, long to the west around Little Mtn., in Sections 20-28, 1200' above NEPA. Both the pipeline and the new gas line intersect this trail both leading and going. It is not depicted on your base map.

Furthermore, you are totally ignoring another important variant which I noted does appear on your base map, starting in Sec. 16, 2200', NEPA. The oil/gas line is right atop this trail for about two miles, on either side of the crossing of Potospatz Creek.

BIA has succeeded in getting both the Senate and the House to introduce legislation calling for the designation of the California Trail as a National Historic Trail, and this legislation is expected to pass with no difficulty this spring. The Butte cutoff and the three variants (Cheyenne, Little Creek and Wyoming) are among the segments to be so designated by the Congress.

The legislature calls for a comprehensive study by the National Park Service, and they are expected to be in the field this summer. A number of us are planning a thorough on-site study of the Butte cutoff areas August 4-10, 1984.

We must ask that you arrest all planning in these critical areas until this study is completed this fall. I think we are going to find that construction of the oil/gas pipeline where it is proposed will cause an unacceptable disturbance to the main Butte cutoff. While we are not opposed to energy development in this area in general, we definitely cannot tolerate the destruction of such large portions of the trail, nor the visual infections caused by placing the elevated pipeline in such close proximity to the segment road.

Respectfully yours,
George F. Pearce
President

cc: The Board of Directors



Game and Fish Department

PORTLAND, OREGON 97202

January 5, 1984

MR. RUSSELL T. LORRAINE
BUTTE RESOURCES
PO BOX 1229
CHEYENNE, WYOMING 82001

Mr. Rick Hartman
State Game Warden
1210 Gardner Avenue
Cheyenne, Wyoming 82001

Dear Mr. Hartman:

In response to your request, MR. R. Lorraine, we have reviewed the final environmental impact statement on the proposed project and offer the following comments. The BIA has not yet issued its formal comment on our letter dated November 21, 1983 on the preliminary final EIS.

The preferred alternative for plant locations has changed from Blue Creek, Green River, and Butte Creek to presented in the DEIS to Bear Creek, Green River, and East Dry Basin in the PEIS. This will place one existing plant in critical deer and mule deer range. The only justification that we can find in the PEIS for this change follows:

1. "This alternative meeting Butte Creek for East Dry Basin would result in increased impacts to deer and mule deer critical winter range at East Dry Basin. This location is preferred when compared to having a gas pipeline, utility pipeline, and power transmission line crossing the Green River in critical deer and mule deer range. The risks of a rupture, and explosion, major, changing routes, etc., greatly palliate with the possibility associated with the Butte Creek site." (Page 3-6).

2. There is concern that the road to the Butte Creek site will cause affiliation into the irrigation ditch and adjacent fields and the Green River. (Page 3-6).

3. American Bison prefer to locate their plant in East Dry Basin. (Page 3-6).

We offer the following responses to those concerns for changing the location of the existing plant:

2-1



**EXECUTIVE DEPARTMENT
DIRECTOR**

January 5, 1984

MR. RUSSELL T. LORRAINE

MR. RUSSELL T. LORRAINE
BUTTE RESOURCES
PO BOX 1229
CHEYENNE, WYOMING 82001

Dear Mr. Lorraine:

During the 40th anniversary of the National Trails System, we are reviewing the final environmental impact statement for the Allay Ridge Oil/Gas Pipeline Project. We would hope that this will be of mutual benefit and aid to the Bureau of Land Management regarding their project.

We would also appreciate your efforts to guide appropriate planning measures with the administration of a program of oil/gas wells that may have been overlooked in prior environmental impact statements.

Respectfully,
Ed DeLoach

ED DELOACH
Game Warden
PO Box 1229
Cheyenne, WY 82001

2-2



Game and Fish Department

PORTLAND, OREGON 97202

January 5, 1984

MR. RUSSELL T. LORRAINE
BUTTE RESOURCES
PO BOX 1229
CHEYENNE, WYOMING 82001

Mr. Rick Hartman
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We offer the following responses to those concerns for changing the location of the existing plant:

MR. RICK HARTMAN
JANUARY 5, 1984
PAGE 2

The DEIS and new gas pipelines will be built under the direction of the Butte Creek pipe line owner. We directed if the Butte Creek pipe line is selected, that the oil/gas line and power transmission lines will be built together. Mitigation measures should mitigate or eliminate problems with birds and cross collisions with those structures, plus impacts to transects from the Butte Creek.

The owners for alteration of an irrigation ditch or of Little Basin, engineering design and modification of roads and the irrigation ditch should eliminate this problem.

The primary reason for the proposed change from the Butte Creek pipe line to the East Dry Basin pipe line appears to be the increased cost of American Bison. These increased costs could come from the expense of pipe crossing design and construction of the pipeline east and under the Green River, and associated mitigation. If the pipeline were built under the Green River, there would be significant increased winter range will be used. While the potential outcome of a pipeline rupture and subsequent spill into the Green River would always be present, should the Butte Creek pipe be selected, we could predict to take that chance over the unlikely case of a critical habitat or wildlife situation with the East Dry Basin pipe line. Mitigation should definitely be arranged for the loss of critical habitat prior to construction on the East Dry Basin pipe line.

Please forward these comments to appropriate federal agencies and contact us if we may be of further help.

Respectfully,
Francis F. Pearce
DIRECTOR
DEPARTMENT
OF NATURAL RESOURCES
PORTLAND, OREGON 97202

PP-388-914
cc: Game Warden
Fish Station

2-3

RECEIVED
DEPARTMENT OF NATURAL RESOURCES

12-4

State Engineer's Office

DEPARTMENT OF NATURAL RESOURCES

CLERK'S OFFICE

December 21, 1981

DEPARTMENT OF NATURAL RESOURCES

2-4

To: Mark Battany, State Planning Director
 1980: Robert L. Mandelis, General Sales Manager
 SUBJECT: State Application No. 81-117, Bigg Ridge Natural Gas Project
 December 17, 1981

I have reviewed the subject State Environmental Impact Statement. It appears that the comments submitted on June 21, 1981 by myself, Mark Battany, State Planning Director, with the State Engineer's Office, have been adequately addressed. The specific of the original project as related to WERC inputs will need to be addressed in a future Study and Final Analysis as required by WERC, 200-0-0-0-0.

cc: George J. Dziedzic, State Director
 Anne Miller, State Director, Project

I have reviewed the subject State Environmental Impact Statement. It appears that the comments submitted on June 21, 1981 by myself, Mark Battany, State Planning Director, with the State Engineer's Office, have been adequately addressed. The specific of the original project as related to WERC inputs will need to be addressed in a future Study and Final Analysis as required by WERC, 200-0-0-0-0.

cc: George J. Dziedzic, State Director
 Anne Miller, State Director, Project

2-5



SERIAL NO. 12

WYOMING RELOCATION COMMISSION

DEPARTMENT OF NATURAL RESOURCES

December 21, 1981

To: Dick Barnes
 State Planning Director
 1980: Robert L. Mandelis
 General Sales Manager
 SUBJECT: State Application No. 81-117, Bigg Ridge Natural Gas Project

WEC 47-11

Dear Mr. Barnes:

The State Environmental Impact Statement (SEIS) for the Bigg Ridge Natural Gas Project was received by this office December 11, 1981. Thank you for the opportunity to review the report.

After reviewing the SEIS, the following relocation commission requests are to be presented before the State Environmental Commission (SEC) and the Board of Equalization (BOE) on January 12, 1982. These requests are intended to be presented along with the Bigg Ridge Natural Gas Project Final Environmental Impact Statement (FEIS). The contents of this letter apply specifically to the Bigg Ridge Natural Gas Project Final Environmental Impact Statement (FEIS) and WEC 47-11 of the SEIS and the BOE is to which our responses refer. Such incorporation may be made.

We are attaching copies of the report from which we believe that the impacts may be placed on relocation areas (as defined) in the following: (a) ELLIOT area; (b) PINE area; (c) SAWYER area; and (d) TETON area. Although the relocation commission agrees with the methodology used throughout the Bigg Ridge SEIS to determine relocation areas, the relocation commission proposes the following modifications and additions to the methodology proposed in the Bigg Ridge SEIS. The relocation commission also proposes the following modifications to the proposed new and increased width range of setbacks, some of which do not relate to land and buildings themselves at all, but instead have different economic and facility requirements. According to the SEIS, the lands for general relocation in the project area is estimated to become by 1985, regardless of when construction is commenced (p. 104, 105, 111, and 201), about one thousand acres of land, or approximately 10% of the total area of the project, including building and a portion of other activities as well as mining and logging. In addition, the 1980 Wyoming Relocation Commission Decision Document (WRC) describes "a certain amount of almost all" relocations areas and facilities" in this area. In light of this information, it is requesting that the mitigation measures proposed for relocation in the SEIS are revised to fit the 1980 WRC criteria.

The relocatee information may be found at Item Plan Book (p. 104 and the 1980 WRC) are concerned about potential losses to the relocation areas and will receive

Mr. Mark Battany
 State Planning Director
 Department of Natural Resources

December 21, 1981

Page -1-

any effects of improvements and other corrective plans on federal lands caused by this project (p. 4-12). However, the relocation commission feels that it is not enough to simply state that monitoring will take place. The FES should give a more detailed and specific exactly how and when the monitoring is to be accomplished as well as how the program is to be funded. Otherwise, the idea of monitoring and assessing impacts has never been considered more evidence than the project notice.

Finally, the relocation commission would like to estimate and explain any previous suggestion that financial resources could be placing a present value to the 1980 WRC. The relocation commission feels that the current valuation (p. 4-12, comment 21-25) of the relocation commission's funds for the various social facilities concerning funding, operation, and maintenance of recreation facilities at Pennsylvania reservoirs were sufficient to not original setting base costs and ensure continuation to future protecting actions.

Respectfully,
[Signature]
 Jim Smith
 Planning Director, DNR

(b)(6)

2-6



2-7

Public Service Commission

DEPARTMENT OF NATURAL RESOURCES

SERIAL NO. 12

JOHN A. KAPPEL
 Chairman
 DEPARTMENT OF NATURAL RESOURCES
 1980: ROBERT L. MANDELIS
 General Sales Manager
 BIGG RIDGE
 Natural Gas Project
 1981: CLIFFORD
 COOK, JR.
 Executive Vice Chairman
 DEPARTMENT OF NATURAL RESOURCES

CHARLES L. BAUDINSON
 Director, Consumer Protection
 DEPARTMENT OF NATURAL RESOURCES
 1980: ROBERT L. MANDELIS
 General Sales Manager
 BIGG RIDGE
 Natural Gas Project
 1981: CLIFFORD
 COOK, JR.
 Executive Vice Chairman
 DEPARTMENT OF NATURAL RESOURCES

WEC 47-11

To: STATE PLANNING COMMISSION
 FROM: Engineering Staff, PSC, (c.e. Vogelberg)
 DATE: December 21, 1981
 SUBJECT: Review of Bigg Ridge Natural Gas Project (WEC)

After review of this report, the following items are advised:

1. The local gas and electrical utilities have adequate supplies to satisfy the needs of both the user facilities and consumer base areas.
2. The electric transmission system, as my view, will have to be rebuilt/upgraded to adequately supply the on-plant units involving gas fired in plants and similar function.
3. As several of the proposed plants have significantly delayed construction, the above comments are still true. The latest word is that Basin Energy LLC is still proceeding to build but they have not chosen the actual site for their three track plant.

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STATE OF WISCONSIN DEPARTMENT OF NATURAL RESOURCES Division of Air Quality 100 East Wisconsin Avenue P.O. Box 7921 Madison, WI 53701-7921 Telephone: (608) 266-1111 Telex: 242-1111 FAX: (608) 266-1111	100 East Wisconsin Avenue P.O. Box 7921 Madison, WI 53701-7921 Telephone: (608) 266-1111 Telex: 242-1111 FAX: (608) 266-1111
THE ENVIRONMENTAL REPORT OF WISCONSIN CONSTITUTIVE WISCONSIN 100 EAST WISCONSIN AVENUE PO BOX 7921 MADISON, WI 53701-7921 TELEPHONE: (608) 266-1111 TELEX: 242-1111 FAX: (608) 266-1111	
MEMORANDUM	
To: State Planning Coordinator From: Gary A. Glens, State Geologist Subject: Valley Ridge Natural Gas Project Final EIS Date: December 10, 1981	
<p>I have received the Bureau of Land Management's comments to my concerns with the Final EIS for the Valley Ridge Natural Gas Project as reflected in the Final EIS. Portions of those responses are listed below, plus inapplicable. My responses will follow responses and cited sections.</p> <p>Response 27.78, page 4-179 (Describing ground permeabilities).</p> <p>This section is on responses to the matter of the reliability of soil strength permeabilities on the Valley Ridge area as provided in the EIS. I do not want to belabor the point, but giving a personal communication to the BLM or an environmental impact statement (EIS) reflects the Final EIS and are very necessary. In addition, the procedures for drilling on offshore platforms are similar to those for onshore drilling in onshore Wyoming.</p> <p>Although there are apparently no historical human activities for surface mining or similar areas, this does not necessarily mean the data are not available. It may only need to one has tried to assemble them.</p> <p>With the existing and anticipated development of surface mining and the real likelihood of high gas, a study of historical permeabilities which are pertinent to the construction of the Valley Ridge are advised since it is not due. A study such as this would be a long way to attain the contents of any paper and could well be if present frequencies are considered to be unimportant.</p> <p>Response 27.79, page 4-179 (Describing planned future statistics).</p> <p>The Final EIS states that the planned future statistics were derived from national failure data and not site specific capture analysis. This position is not very reassuring, particularly since we were not provided a</p>	

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State Planning Coordinator	December 10, 1981 Page 2
<p>copy of the Health and Safety Technical Report cited in the Final EIS. Again, this document suggests it is time for a detailed study of future probabilities specifically germane to surface mining. It also would identify the various activities that affect wells and the public as well as pipelines.</p>	

2-10

THE STATE OF WISCONSIN Department of Environmental Quality	100 EAST WISCONSIN AVENUE PO BOX 7921 MADISON, WI 53701-7921 TELEPHONE: (608) 266-1111 TELEX: 242-1111 FAX: (608) 266-1111
<p>RE: Valley Ridge Natural Gas Project 100 East Wisconsin Avenue P.O. Box 7921 Madison, WI 53701-7921 Telephone: (608) 266-1111 Telex: 242-1111 FAX: (608) 266-1111</p> <p>TO: Robert R. Daniels, Director Department of Environmental Quality 100 East Wisconsin Avenue P.O. Box 7921 Madison, WI 53701-7921 Telephone: (608) 266-1111 Telex: 242-1111 FAX: (608) 266-1111</p> <p>FROM: Randolph Wood, Administrator Air Quality Bureau 100 East Wisconsin Avenue P.O. Box 7921 Madison, WI 53701-7921 Telephone: (608) 266-1111 Telex: 242-1111 FAX: (608) 266-1111</p> <p>DATES: December 10, 1981</p> <p>SUBJECT: Comments on the Final EIS for the Valley Ridge Natural Gas Project.</p> <p>A great deal of public concern for the offsite project has been directed to projected noncompliance with ambient standards for SO₂ and NO_x and to a perception that enforcement control techniques (Massachusetts Source Technology Control) will not be applied at the facilities.</p> <p>The Final EIS clearly notes that the cause of noncompliance for assessing compliance with standards and for taking control technology decisions is the permitting process. This process cannot take place until after specific technological and economic site studies data have been gathered for at least one year.</p> <p>In order to eliminate any confusion, the public should be advised that the EIS process and the Air Quality Bureau process are independent, and serve two completely different functions and that the Bureau will assess compliance with all Air Quality Standards and Regulations including the requirement to control SO₂.</p> <p>RE: 100</p>	

3-1

EXON COMPANY U.S.A. 100 EAST WISCONSIN AVENUE PO BOX 7921 MADISON, WI 53701-7921 TELEPHONE: (608) 266-1111 TELEX: 242-1111 FAX: (608) 266-1111	December 10, 1981 <i>[Signature]</i>
<p>Valley Ridge Project Comments on EIS</p> <p>Mr. Russell D. Lawrence Bureau of Land Management Wisconsin Office BLM Denver Region Circus Park, WI 53701</p> <p>Dear Mr. Lawrence:</p> <p>Attention and Exxon Company, U.S.A. comments on the Valley Ridge Project Final Environmental Impact Statement. Should you have any questions on our comments, please contact Frank Clegg at (608) 266-6225.</p> <p><i>[Signature]</i></p> <p>TJG:jl 100 East Wisconsin Avenue P.O. Box 7921 Madison, WI 53701-7921 Telephone: (608) 266-1111 Telex: 242-1111 FAX: (608) 266-1111</p>	

3-2

**EIS/EA FOR PARTS 1, 2 & 3 COMMENTS
ON THE BELT RIDGE
FINAL ENVIRONMENTAL IMPACT STATEMENT**

The following comments have been submitted by the Forest Service Final Environmental Impact Statement.

SECTION 3

We are pleased to note that beneficial impacts have been included in the major impacts section portion of this section. We are also happy to note that the EIS associated with the coal gas plant funding both the Black Rock and Elko Creek plant sites have been more reasonably defined.

On page 1-9, we note that, as a result of the reorganization of the Forest Service, the coal gas plant significance section in the Draft EIS has been changed to water supply impact in the wilderness areas. This has resulted in the listing of significant impacts on wilderness water supply in the Draft EIS. It appears to us that this reorganization is arbitrary and may be a consequence of the high profile generated from the issues of the coal gas plant. We believe that the water supply criterion which attempts to relate impacts to water quality to impacts to fisheries is derivative and a better approach to determining impact significance.

We also note that the listing of significant impact is based on pH changes in the most sensitive lakes resulting from plant flueing. It appears that the assumption is that water that flows through a given stream would not then be impacted by the plant. The old EIS had a much more detailed analysis of water protection during air flueing events and is appropriate to be included in the proposed action. We question whether it's appropriate to make a determination of significant impact on the basis of a low probability situation which is of a very short duration. We suggest that the probability of a flueing event for oil plants occurring in the area that will speed and duration would cause the plant to impact the area just as much as the coal gas plant. We believe that the water supply criterion is appropriate. These new impacts should be considered significant. We suggest that the significance criteria relate to natural resources over the long-term. If this were the case, the West Crater diversion would not normally result in a significant impact.

Now with the EIS/EA Action Plan determine whether impacts from the Elko Ridge Projects exceed the significance criterion to be present? We are concerned that the proposed diversion program will not be able to discern where and determine if mining does not have an impact will be made than most of it results from Elko Ridge Projects' activities. Consequently, we recommend that the EIS/EA Action Plan be modified to prevent further assessment of the West Crater diversion's possible impacts on the wilderness area.

3-4

- (d) after effects of conservation are removed in the major study results, indicating that U.S.A. energy supply requirements will fall 4.1 quadrillion Btu in the year 2020 as compared to 75.8 quadrillion Btu in 1980. Domestic natural gas production is projected to provide 20 percent of the nation's energy needs by the year 2020 at 10.8 quadrillion Btu by unconventional, conventional and other renewable sources. Foreign imports are projected to supply 15.8% of the nation's total energy supply by 1990.

- (e) the portion of the major national Energy Information in the year 1980 indicates that U.S.A. energy supply requirements will fall 4.1 quadrillion Btu in the year 2020. An projected increase of natural gas production will provide about 19 percent of the nation's energy supply in that year. This represents a slightly smaller percentage than in 1980, however, the projected total energy supply requirement is 14.8 quadrillion Btu, or about 14% less than in 1980 due to the projected overall energy demand. Total renewable energy output is forecasted to increase by 322 percent, from 4.2 to 8.7 quadrillion Btu from 1980 to 2020. However, with total large projected increases, domestic energy output will still only supply about one-half as much energy as will imported natural gas to the year 2020.
- (f) The nation's major oil and gas reserves as of January 1981 are 36.7 trillion cubic feet (TCF) or 163.8 quadrillion Btu in the lower 48 states, and 33 TCF in Alaska. Based on the Department of Energy's historical domestic natural gas production and total TCF between 1981 and 1986, it is apparent to us that Alaska natural gas is not increasing rapidly enough to meet the projected growth in energy requirements. Current gas production/consumption ratios indicate only a 1.5 year gas supply (excluding Alaska) at the present rate of consumption.
- (g) The Department of Energy analysis shows that 90 percent of 1986 domestic gas production will come from reserves discovered since 1973, and that it warns that "the shortages of domestic production will set in for the next 10 years on exploration and development of new gas reserves".

Copies of the referenced report are available from:

National Energy Information Center, 20-00
Energy Information Administration
Federal Building
Room 1P-940
Washington, D.C. 20585
1-800-221-9888

Reproduction of Documents
U. S. Government Printing Office
Washington, D.C. 20402
1-800-221-9118

3-3

SECTION 4

GENERAL

We have noted the many comments from Del Norte and others appertaining to the Draft Environmental Impact Statement. We will consider all those necessary in developing our plan and in particular we propose to work with the various agencies in responding to the issues and concerns raised by their respondents.

4.1 Environmental Defense Fund's Comments

Comments concerning the need for the project, considering the effects of conservation and alternative energy sources, were expressed in the Environmental Defense Fund's letter in the following machine:

- 1.1 The EIS fails to give an adequate analysis of the purpose and need of the proposed action.
- 1.2 There is a lack of discussion on alternative energy measures such as conservation.
- 1.3 The EIS is silent in its study of the existing economy.
- 1.4 The Del Norte Alternative is outlined because it fails to discuss existing oil quantity as a component for the proposed project.

We believe that EIS response letter used for the project is not an issue to be addressed in this EIS. However, we offer the following as supporting information we have presented to FERC and the other appropriate energy regulatory forums over the past 10-12 years.

A detailed analysis of the nation's energy future is presented in the Department of Energy's 241 page report to Congress and the public, 1982 Annual Energy Outlook, May 1980. The Department of Energy's report reflects a greater national dependence on domestic gas production than does EIA's 1980 study which was reflected in the 1981 Energy Information Agency's Annual Energy Outlook (AEO) and includes energy resource consumption and market forces. The report presents detailed data for all U.S.A. energy sectors, including conventional fossil, nuclear, hydroelectric, renewable, nuclear power, and the effects of conservation. Scenarios of energy trends are presented for the period 1980 through 2010. The projected annual consumption trends generally show a continued decline in energy consumption through the year 2000. Summary data for both the long and short range studies are provided in Table 3-1 and Table 3-2. In-depth details were extracted directly from the report.

Table 3-1 in the Department of Energy's report which is particularly relevant to the Environmental Defense Fund's comments are as follows:

3-5

SECTION 5

We believe that a comment should be added in responding to 24-11 which states that "we do not believe the Del Norte project will have a significant impact on oil wells in the area." These data will include cumulative background information on oil leases present which will be taken as part of the overall assessment of cumulative impacts.

5.1 Cumulative Monitoring

We believe that the recommended additional study, i.e., gathering of sufficient hydrogeological information on the wells to determine a trend, will be extremely difficult to implement due to existing regulations. We believe that more effort is required to obtain a revision of the "Groundwater Effectiveness of Existing Discharge Alternatives". Our alternative, combined with environmental and oil spills monitoring appear to offer the greatest potential for quick detection of potential problems as well as long term health determination.

5.2 Oil Spill Related Safety Action Plan

We feel the proposed program appears to overly overlap. Please advise responsible state, a major concern is the lack of specificity in determining which extraction source are having any adverse impacts. We believe that any observed impacts will be assumed to be caused by the West Crater project facilities when, in reality, some are being caused by any number of sources within the region.

Although baseline data will be obtained in 1984 and 1985 before plant facilities become operational, it is possible that there will be insufficient information to determine preexisting levels. It is also unlikely that plant startup changes in measured parameters will pass changes large enough to trigger Elko Ridge project safety triggers. We believe that safety techniques for "large piping" and "large structures" using Babcock and Wilcox's recommendations should be incorporated into the program and we would be happy to assist the Forest Service in modifying their programs to accommodate this.

5.3 Cultural Resources/Archaeological Consideration

In the comments outlined on pages 3-19 and 3-48, there appears to be little connection between the approach the local management agencies and BLM. We suggest that oil field development and extraction include the approach as well as others discussed.

5.4 Biological Assessment

The discussions on page 3-19 regarding oil field noise in the arid of adjacent waters to be in the same location may be impossible to achieve given the fact that federal and local agencies will be different because of different ecology levels and carrying capacity of species. One leg in itself will be different because of water type and length of open. A better solution would be to modify areas already on oil lines crossing riparian areas to increase oil discharge locations.

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Mr. Russell T. Lawrence
December 10, 1981
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is also a partial indicator of the real extent of emissions to outside air. In addition to emissions, a number of other items, CDRS long-term records are required to evaluate the potential impact of proposed actions on the environment. This review may include potential losses and potential impacts of long-term impacts will depend primarily on the source of combustion effects, and associated composition of smoke species, with which each species depends with response to its life spans. The CDRS predicts that hot smoke will be the primary source of smoke in the atmosphere, because it will contain the highest concentrations of smoke particles. The loss of visibility and particle losses and the prediction of future effects on visibility impacts on short term, and the predicted dependence of the long-term value of their mitigation.

as in the area of air quality related issues that MCD believe may be most important, particularly noise and the predicted deterioration of air quality. Air quality has been predicted, because of this, and due to the current time available to us, we will confine the balance of our comments to air quality issues.

First and foremost, we consider that any potential impact or reduction of air quality should be measured to be representative of all environmental releases. Valley Ridge will impact the Badger and Fitzpatrick Watersheds Areas. Any impact should be considered a threat to the areas which will experience degradation problems. Irritable air quality would not allow reliable prediction of the presence or types of acid deposition or complex factors such as that of the smog. Therefore, we will not make any specific predictions of acid rain or acid rain effects on the behavior of metals and other air quality related issues and propose no specific systems or research areas. Any impact, however slight, should be presented before the task committee to depict a change and prioritize a issue should potentially be considered and would continue efforts to reverse that change if it is found that is present.

On the basis of the position outlined in the above paragraph, we offer the following recommendations. The DOD should detail on the specific document when environmental monitoring, including surveillance of areas, will be required of all operations. The operation should bear the costs of all monitoring. These recommended tasks to be monitored should be detailed in the environmental monitoring plan. The DOD should be responsible as well as on the best available methods of pollution dispersion. An adequate system of recommendations tasks should be chosen and listed in the document. All baseline monitoring data are now available at the time the decision to conduct monitoring should make for inclusion of a line or a later date to extend the date of commencement of monitoring.

The decision should stipulate what actions will be taken by an operator of operations as soon as impacts on air quality become apparent. In addition, the environmental monitoring plan will be required to include the DOD, the Badger and Fitzpatrick MAFS action plan should be amended to include this requirement. A similar requirement for corrective action is contained in Appendix A-2, Pollution and Surface Water Quality Monitoring Program. Appendix A-2 does not

4-3

Mr. Russell T. Lawrence
December 10, 1981
page 1

sufficiently address Agency or industry areas. Any change which could be attributed to improved functioning or other natural causes should be ignored as an impact of Valley Ridge operations. Any reasonable decrease in gas should be considered significant. A value of 0.1 pp should not be chosen as the criterion of significance. The presence and intensity of pH measurements, however, can be used to serve as a guide for potential degradation. Testing of the acid rain potential periodically can corroborate. It may be difficult to detect pH changes, therefore, one or more no problem acid/base values, any change should be considered significant.

Given the DOD has not provided the detail of a final plan, the environmental monitoring plan and the air quality section of the environmental impact statement should be updated by the Wyoming Department of Environmental Quality in taking over reviewing PMR permits. Specifying an use a need for a policy or regulation on the state level which requires what information will be needed to meet the documentation requirements outlined for the DOD. The plan of environmental monitoring should provide for the use of the DOD's plan of a permanent facility base. This is an adverse impact of an MAFS. It would be DOD's advantage, not to mention the Badger and Fitzpatrick watercourses involved. If these policies were adopted "before the fact," it would assist the DOD in applying the review process by avoiding delays while the State reviewed information submitted by the federal land manager. The State could then provide the information for those investigations, or already commence the investigation. The DOD and FERC deserve to work with DED in formulating a policy for increasing the permit applications with respect to right-of-way. Such a cooperation effort should have place before DOD is confronted with deciding whether one segment becomes an adequately determined that an adverse impact will occur, and action taken based with the question of how to handle such an impact after a permit has been issued.

Finally, a Wyoming monitor (PMR), capable of working on the MAFS under the DOD's control panel, yet this letter was neither presented nor acknowledged to the FERC; this concern should be made public and his needs should be addressed.

In conclusion we would like to emphasize that whenever possible impact should be avoided rather than mitigated or corrected. Any prevention is not preferable to other management objectives. Monitoring should be tailored to meet specific objectives and mitigations should be strictly adhered to the degree of protection required. Monitoring should be done to determine the effects of state wide actions in particular segments versus performance standards. Details segments can be almost negligible when viewed in the proper perspective. For example, the 10 million tons of a 100-ton contaminant present in the Badger and Fitzpatrick could add only 20% to the ton of producing 1 billion cubic feet of natural gas. The cost of remedying unknown impacts, on the other hand, may be huge. The cost of all or in an irrecoverable impact could be beyond prediction.

Thank you for this opportunity to take part in your decision-making process. Please give consideration to my request to extend the comment period to

4-4

Mr. Russell T. Lawrence
December 10, 1981
page 4

provide the public an better review changes and modifications to the DOD and suggestions documents.

Sincerely,
Ruthie K. Beck
Ruthie K. Beck
Secretary Director

cc: Mr. Mike Tolosa
Environmental Defense Fund



Powder River Basin Resource Council

410 Main Street, Sheridan, Wyo. 82801 (307) 672-5400

Rev. (11/13/1981)

Re: MAFS
Wyoming Department of Environmental Quality
Division of Land Management
Services
MTC Ranch Project
Wyoming Dept.
Interstate Collected Board



Included are a few comments on the Final Environmental Impact Statement for the MTC Ranch Natural Gas Project. Please consider these comments before your final action to take responsible mitigation.

The most serious problem appears to be a lack of specific information as to the location of areas of the proposed development sites. Baseline data and specific information on air, land, and water conditions need to be established as a part of the MAFS Environmental Assessment process. The comments outlined by this DOD letter on various aspects of the study appear to provide environmental baseline and mitigation measures unless the federal government's responsibility to determine the potential environmental impacts and to implement specific mitigation measures as a condition of any federal action that could significantly affect the quality of the human environment. The purpose of this is to identify the social, economic, and environmental implications of project development and to designate mitigation measures, not to defer, mitigate and delay such actions.

The following information needs to be addressed. A supplemental Draft Environmental Impact Statement should be the proper vehicle for such action. These issues have applied to Wyoming Industrial Mining Council for a permit, specific information on air and water needs to be provided at this site.

1. **WYOMING-INDUSTRIAL:** What will likely project impact on Wyoming's neighboring communities and peak consumption markets (over their jobs and start collecting unemployment). Housing needs were identified as a significant impact, but mitigation measures were deferred to Wyoming's Industrial Mining Council. The Wyoming Industrial Mining Council has no housing problems but there is no guarantee that the council will require the companies to make mitigation measures not connect to residential development.

2. **42B (WYLD):** We know and understand that only an off-site environmental data. Especially since these proposals to develop the project, this data set is still a mystery. What the environmental impact will be. Why not include this and collected? Resettlement plans for our gas extraction apparently will be developed in the future. **WYLD:** What is the alternative mitigation plan may not be able to be developed. A site should be incorporated in the bill.

4-5

4-6

that assurances from the EIS team prove that an effective mitigation plan can be developed and that alternatives will make a plan for EIS less necessary to sufficiently quantitate or mitigate impacts after construction. The need for further mitigation analysis is still appropriate, provided that it is limited to the mitigation measures required by the effects of proposed construction on the land being discussed, not what will be the impacts on soils and vegetation added by buffering capacity of the soil to be disturbed. The Final EIS and accompanying adequate discussion of land level EIS impacts on people, livestock, and wildlife. The use data and research. What impact will EIS mitigation have on vegetated land? What can be done to those impacts to develop data and monitoring plans, etc. This will be important if a federal action, the Federal government has a responsibility to develop information, monitoring plans, and mitigation measures.

III. DATA QUALITY: The EIS team emphasized that little if any information concerning specific production benefits is known. Data on existing conditions, and estimated future trends, are critical to the analysis in part of the EIS process, & a supplemental EIS should be prepared and include the following minimum information and a monitoring plan that addresses this specific condition. The environmental tail consequences of deep well injection of methane should be evaluated over basins before an environmental action is taken with incomplete knowledge of potential environmental consequences. Consideration of the valuable resources used in drilling or pumping, impacts on surface water through ground-water interaction are discussed would be identified in the EIS.

IV. AMPLIFICATION: What are the significant impacts to resources using the data from Phase 1 EIS, and how could these impacts be mitigated. EIS and the Forest Service have not done an adequate job of developing mitigation measures to reduce impacts to specific environmental resources. These does not appear to be anything that prevents the EIS team from developing a response to mitigate impacts to forest resources. The use data and research to develop a response to specific operations should be included in a Supplemental Draft EIS.

5. GAS FLOWBACK: This will allow EIS and EIS team to at least to the near future with no penalty or incentive to increase their extraction pressure. EIS and EIS team have concluded - why waste something that we know how to be utilized? Why are negotiations of this resource not continued? By assessing property payments on vented gas wells, the companies have greater incentives to develop a market. The incentive to EIS companies to waste valuable resources, and there will always be a need for the gas to be developed and completed used, should be reviewed.

Please excuse the typing errors. At this time I only have access to an old and broken machine. I will re-type and send these comments in next week. In the meantime, I thought it important that you receive these comments.

I appreciate your opportunity to comment. I expect that these comments will receive careful consideration and that the Northwest Energy Response Council will receive responses to all of the points raised herein.

4-7

Once again we would like to urge you to consider the lack of basic information contained in the Final EIS and to make a more detailed environmental impact statement. Since EIS has excluded the industrial activity unit, baseline information for this action needs to be developed immediately and incorporated into the EIS.

Respectfully submitted,

David Parker
Staff Director
Pacific Sierra Caucus
Resource Council
811 W. 21st St.
Seattle, Washington

REC'D BY REC'D BY

4-8

WESTERN PIPELINE CORPORATION

REC'D BY REC'D BY

December 21, 1981

Mr. Russell T. Lissner, State Director
Bureau of Land Management
Wyoming State Office
FWS Region 1
Cheyenne, Wyoming 82201

Dear Mr. Lissner:

The Final Environmental Impact Statement for the Riley Ridge Natural Gas Project has been received by Western Pipeline Corporation.

We again commend the Bureau of Land Management, U.S. Forest Service and Environmental Management and Protection. You do a well done treatment of a complex project. The addition, changes and deletions made for consideration in the final EIS were very consistent and are very welcome. The use of mitigated impacts in the comparative analysis portion is a noteworthy example. We also thank the commenters' propensity for the consideration given to our comments and criticisms of the draft.

We at Western have enjoyed working with your staff in the Wyoming offices. The former Director personnel in Big Flats, Cheyenne and Rock Springs and other agents in Fort Collins and Denver. There has been an association of mutual respect with these people since the inception of this project. Your panel did. We look forward to any future associations or projects yet to come.

Sincerely,
WESTERN PIPELINE CORPORATION
Frank L. Kroll
Mr. L. Kroll
Environmental Affairs

REC'D BY REC'D BY



DEPARTMENT OF HEALTH & HUMAN SERVICES

From: Frank L. Kroll

Center for Disease Control
Atlanta, Georgia

November 21, 1981

Mr. Russell T. Lissner
State Director
Bureau of Land Management
Wyoming State Office
FWS Region 1
Cheyenne, Wyoming 82201

Dear Mr. Lissner:

We have completed our review of the Final Environmental Impact Statement (EIS) on the Riley Ridge Natural Gas Project, Wyoming, and the Western Pipeline Corporation, Wyoming. We are responding on behalf of the U.S. Public Health Service.

We have commented upon numerous in our comment of July 12 on the Draft EIS and find that to be satisfactory. We concur that as part of the transmission and New Plant, each pipeline should be required to submit a "gas gas" pipeline health and safety design, construction, and operation plan for approval. Every sensible safety design requirement will reduce the possibility of a serious and maximize the chance of an emergency should such an event occur. We also recommend that criteria be established for all pipelines to the facility and baselines to implement the established contingency and construction plan for the integrity of the well field, pipelines, and plant facilities.

Sincerely yours,

Frank L. Kroll, Ph.D.
Chief, Environmental Affairs Group
Center for Environmental Health

REC'D BY REC'D BY

6-1

Docket No. 7-1-2002

Dear Mr. Chairman:

During my review of the docket, I found two key data for review. As you may already know, the BLM has issued the proposed rule, BLM-2002-00000, to issue the appropriate permits to conduct oil and gas development in the San Juan Basin. This proposed rule was issued on May 21, 2002.

On April 22, 2002, the Colorado Department of Natural Resources, a take permit was issued to conduct oil and gas development in the San Juan Basin. This permit was issued under the Colorado Oil and Gas Conservation Commission's rules and regulations. This permit is valid through April 22, 2006. The San Juan Basin is one of the oil and gas producing basins in the state of Colorado.

The proposed rule, as well as the take permit, have similar requirements for oil and gas development in the San Juan Basin. Both documents require that operators must submit reports and track the progress of their projects. The primary difference between the proposed rule and the take permit is that the proposed rule requires operators to submit quarterly reports, while the take permit requires annual reports.

I am requesting your comments on the proposed rule and the take permit. In particular, I would like to know if there are any significant differences between the two documents.

For example, the proposed rule and the take permit both require operators to submit reports quarterly. However, the proposed rule requires operators to submit reports annually, while the take permit requires operators to submit reports quarterly. This is a significant difference.

In addition, the proposed rule and the take permit both require operators to submit reports quarterly. However, the proposed rule requires operators to submit reports annually, while the take permit requires operators to submit reports quarterly. This is a significant difference.

I am requesting your comments on the proposed rule and the take permit. In particular, I would like to know if there are any significant differences between the two documents.

7-1

RECEIVED
U.S. MARSHAL SERVICE
BOSTON
JULY 1, 2002



UNITED STATES
DEPARTMENT OF THE INTERIOR

FISH AND WILDLIFE SERVICE
1200 G STREET, SUITE 500
WASHINGTON, DC 20004

7	1	2	3	4
5	6	7	8	9
10	11	12	13	14
15	16	17	18	19
20	21	22	23	24

JULY 1, 2002

FBI-BOSTON

Revised Rule

To: Michael J. Murphy, U.S. Office, Bureau of Land Management, Denver
1501 Jackson Street, Denver, Colorado 80202

From: Regional Leader, Biological Services

Subject: U.S. Fish and Wildlife Service (FWS) Comments on the BLM
Proposed Rule

This response is FWS's testimony to the BLM, dated July 1, 2002, before requesting our review and comment on the proposed rule and BLM's response to public comments on the rule.

Comments on the Rule

Comment 1:

See comment on 20.1

20.1

BLM and the applicant should be more than cautious about oil and gas activity in greater Sage Grouse habitat areas.

First, monitoring requirements will be problematic since oil and gas wells can cause severe damage to the sagebrush habitat. Second, we still recommend that the earliest stages of land reclamation should eliminate heavy metals residue in oilfield areas.

20.2

See comment on 20.2

20.3

See comment on 20.3

8-1

ATTACHED MANUFACTURED STRUCTURES			
JULY 1, 2002			
1	2	3	4
5	6	7	8
9	10	11	12
13	14	15	16
17	18	19	20
21	22	23	24

BBL Petitions
Rock Springs, WY 82901

July 1, 2002

Mr. Michael S. Turner
Interior State, Natural Resources
P.O. Box 715
Big Piney, WY 82833

Dear Mr. Turner:

Thank you for speaking with me after the Rock Springs hearing on the Big Piney Project. This letter will address the concerns I briefly mentioned at that hearing. It is my opinion that the uncertainties involving the potential for acid mine drainage impacts to the Bridge Wilderness are large enough to warrant an expanded baseline and monitoring study.

To support my opinion, I will address the factors mentioned in the comment statement on page 3-38—Acid Mine Drainage. Paragraph 1. This statement must control mine waste discharge; however, I agree that it is a poor place to start.

1. Baseline Strengths—WY - RD

This factor should be relatively well established and plenty... I will accept the supplied data showing that, in the first analysis, it will exceed the limits of the stream, or the quality of the water will never fully recover unless all the wells are treated.

2. Geosphere, lithosphere, hydrogeosphere

Page 2-10, "Current planes are not designed to account the uncertainty or to reduce any other lithosphere area." In effect, this puts a lid on the basin, interrupting the pollutants until they are removed through dissolution.

In project impact, disruption within the basin is critical... I agree that in the absence of other hydrogeologic data, the Fort Bridger data are the best to go on. However, data show a 30 years old and 20 miles away from the closest plant (lower to flow the stream) is not, to my opinion, representative. The precipitation and soil patterns vary annually as the last several years have shown.

I disagree that the proximity of the station is favorable to the stream. The Fort Bridger station is located well in to the very northeast mountain range in the Grand Tetons and east, therefore, is influenced by it. Other stations are closer and should, therefore, be more representative.

Comments on:

70. Response

Any overland pipelines or culverts/sidewall structures, as stated by our original comments, that may affect water should be installed on stream embankments that could affect riparian resources.

See comment on 20.5

Riparian surfaces should be protected prior to initial construction. At present, arid desert areas, we recommend that the revised Information regarding the water surface and 100-ft riparian areas should be coordinated with BLM offices.

Please contact this office or our congressional office in Denver. Return to this section...

Arthur Anderson

CC:
Regional Director, Denver, Colorado (1)
Field Supervisor, Billings, Montana (1)
Bureau of Land Management, Cheyenne, Wyoming
Bureau of Land Management, Rock Springs, Wyoming
Planning Group and Field Department, Cheyenne, Wyoming
Public Meetings, BLM
Office of the Secretary, DOI, Denver, Colorado (1)(1)(1)(1)(1)(1)

8-2

Mr. Douglas L. Turner

Page 2

July 8, 1983

If one compares the wind rose data from the Baseline and Winterset stations, it would appear that relatively winds at the latter station were more prevalent than those at the Baseline station, indicating more easterly winds. The period of record, however old and short, is the best we have.

I also do not agree that the wind rose situation is prepared well. As the Baseline data are derived from the station, I can only assume that lateral dispersion of the pollutants on a continental scale is assumed. The wind rose situation, as I see it, is a facing plane with little lateral dispersion still results in given levels or monthly paces. For example, the pollutants from the Iowa River plant could be transported into the Des Moines bag country and primarily impact that area alone. This is not to say that this could not occur; it seems to me that this is also a possibility.

We are, therefore, faced to a need that was developed across the basin and may or may not be applicable and using dispersion data largely the single most important piece of data that is 20 years old, and which removes from the predicted exercise. Three factors were chosen for monitoring that the model predicted would suffer most:

I assume that only shallow, high-altitude levels in the grid planes would fit the criteria you selected in choosing these sites. Therefore, the choice really does to geographical diversity. I assume there is diversity; however, I would add a high altitude factor to each factor because I believe we don't know where the impacts will occur.

4. Biospheric Impacts Analysis

The basic biodiversity is uncertain uncertainty, but see for basic resources.

5. Geology

Geology is undoubtedly the only issue with which we deal in the After Stage Project.

6. Climate

Regional climatology may or may not be dynamic. In a short-term (10 year) sense, beyond my knowledge worldwide climatology is undergoing change.

7. Soil, Water, and Hydrograph Characteristics

Information of IGT Inc. and your own staff, there is little information on these parameters in the dredge differences.

8-3

Mr. Douglas L. Turner

Page 2

July 8, 1983

I would recommend, in the absence of any data, that a good, comprehensive ecological study be made prior to the project going on site.

In summary, I find little fault with the EIS or the Air Resources Technical Report. On the contrary, it appears that they are well researched and written.

The Big Ridge Project represents a substantial impact. Acid deposition may prove to be negligible due to the projected take off changes or it could be substantial. I don't think anyone would argue that acid deposition is not an important concern; especially when it is presented in the EIS and other documents. It is not certain that a such a comprehensive baseline study should be done and a monitoring program be designed to mitigate impacts over a broader geographical area. A follow-up to the baseline study should also be planned to ascertain any impacts.

What are any mailing worn to a pristine area that is proximate to a great many industrial facilities? Is the impact of acid deposition greater than the present? If someone at IGT or DSD is willing to speculate that acidification and deposition effects will be negligible, I and a few of my colleagues would like to seek site or two.

I have attached comments that will accompany my general comments.

Unusually,

Douglas L. Turner
Dredge Team

D.L.T.
Dredge Team

Comments by D.L.T.

(Mr. Wenzel's comments, continued)

Location: Iowa City, Iowa
Elevation: 750 ft.
Average Altitude: 300-350 ft. above sea level
Altitude: 300 ft.

Distance from nearest town: 10 miles

Distance from nearest road: 1 mile

Closest town: Iowa City, Iowa
Closest river: Iowa River

Closest bridge: Iowa City

Closest railroad: Iowa City

Closest power line: Iowa City

Closest gas line: Iowa City

Closest water line: Iowa City

Closest sewer line: Iowa City

Closest telephone line: Iowa City

Closest post office: Iowa City

Closest bus stop: Iowa City

Closest gas station: Iowa City

Closest grocery store: Iowa City

Closest supermarket: Iowa City

Closest service station: Iowa City

Closest hospital: Iowa City

Closest medical facility: Iowa City

Closest library: Iowa City

Closest school: Iowa City

Closest church: Iowa City

Closest park: Iowa City

Closest cemetery: Iowa City

Closest golf course: Iowa City

Closest boat launch: Iowa City

Closest beach: Iowa City

Closest campsite: Iowa City

Closest boat dock: Iowa City

Closest boat ramp: Iowa City

Closest boat storage: Iowa City

Closest boat launch: Iowa City

Closest boat dock: Iowa City

Closest boat storage: Iowa City

Closest boat launch: Iowa City

Closest boat dock: Iowa City

Closest boat storage: Iowa City